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Attorney for Creditor John A. McCall, Jr.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING

In re:)	
)	
BOTW Holdings, LLC)	
)	Case No. 24- 20138
Debtor.)	Chapter 11
)	
)	
)	
In re:)	Case No. 24- 20141
)	Chapter 11
)	
HUSKEMAW OPTICS, LLC)	
)	
)	
In re:)	Case No. 24- 20142
)	Chapter 11
)	
BEST OF THE WEST)	
PRODUCTIONS, LLC)	
)	
)	

**CREDITOR JOHN A. MCCALL, JR.'S MOTION FOR 2004 EXAMINATION OF
DEBTORS AND THEIR SUBSIDIARIES FOR PHYSICAL INSPECTION OF
INVENTORY**

Pursuant to Fed. R. Bankr. P. 2004, Creditor John A. McCall, Jr hereby moves the
Court for entry of an order compelling debtors and their subsidiaries Best of the West
Arms, LLC, Best of the West Ammo, LLC to allow physical inspection of their inventory

and equipment at all locations where their inventory and equipment may be kept, including inspection of their federal firearms license books and records.

Creditor requests that debtors be compelled to allow such inspection by Creditor or Creditor's designee within 14 days after the production of documents request in Creditor's related 2004 Motions.

The Court has jurisdiction over this motion under 28 U.S.C. §1334 and 157)(a). This matter is a core proceeding under 28 U.S.C. §157(b)(2). Venue is proper under 28 U.S.C., §§1408-1409.

On July 18, 2024, debtors filed subchapter V plans of reorganization. The Subchapter V plan filed for Best of the West Holdings, LLC for example, makes no attempt to value the assets of its wholly owned subsidiaries Best of the West Arms, LLC and Best of the West Ammo, LLC. *See* Dkt. No. 101, at 7 ("Descriptions of Holdings' Petition Date assets are set forth in the Schedules filed with the Bankruptcy Court"). The Schedules merely list Holdings' 100% ownership in the subsidiaries with no attempt at valuation. *See* Dkt. No.

In order to evaluate debtors' proposed plans, Creditor should be allowed physically to inspect the inventory and other assets of debtor or of debtors' subsidiaries/ affiliates Best of the West Arms, LLC and Best of the West Ammo, LLC., wherever located.

Creditor respectfully request that the court enter an order directing debtors and their affiliates/subsidiaries to allow a physical inspection within 21 days of the Order for Examination.

A proposed order is attached.

DATED: August 13, 2024

___/s/ Clark Stith_____

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CERTIFICATE OF SERVICE BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I certify that, on August 13, 2024, I electronically filed the foregoing **CREDITOR JOHN A. MCCALL, JR.'S MOTION FOR 2004 EXAMINATION OF DEBTORS AND THEIR SUBSIDIARIES FOR PHYSICAL INSPECTION OF INVENTORY** with the United States Bankruptcy Court for the District of Wyoming by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system:

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/s/Clark D. Stith
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